

EXHIBIT C



LAW FIRM OF
OMAR T. MOHAMMEDI, LLC

233 BROADWAY, SUITE 820
WOOLWORTH BUILDING
NEW YORK, NY 10279
PHONE (212) 725-3846
FACSIMILE (212) 202-7621
WWW.OTMLAW.COM

OMAR T. MOHAMMEDI, ESQ.
DIRECT DIAL: (212) 725-3846 x101
EMAIL: OMOHAMMEDI@OTMLAW.COM

May 7, 2024

VIA ELECTRONIC MAIL

Dr. Laura Sosa, Dean
Mercer County Community College
1200 Old Trenton Rd
West Windsor Township, NJ 08550
sosal@mccc.edu

Mr. Andrew Quinn
Chief Operating Office
Infinity Flight Group
10 W Piper Ave,
Ewing Township, NJ 08628
quinna@mccc.edu

Re: Hazem Alseginy v. Mercer County Community College

Dear Dr. Sosa and Mr. Quinn:

This firm represents Hazem Alseginy in the above captioned matter. Hazem is a former student at your aviation school. Please take notice this is a demand letter requesting that Hazem receive the full \$50,000 for the tuition he paid to the school due to his unlawful dismissal, lack of proper training, violation of the federal and state rules exposing him to safety concerns, failure to supervise and provide a safe environment during his tenure as a student at Mercer.

The arbitrary and discriminatory dismissal of Hazem, coupled with a series of egregious safety violations and unfair treatment he experienced during his time at your institution, is unconscionable. Hazem enrolled at your aviation school on September 5, 2022 for a five-semester program with the expectation of receiving quality education, and a safe environment free of hostile treatment and proper training in the field of aviation. However, his experience was marred by numerous instances of negligence, lack of supervision, and discriminatory practices that have not only jeopardized his safety but also undermined his trust in his safety while attending the flight school. The school flight safety compliance pursuant to the Federal Aviation Agency Regulations *14 CFR Ch. 1, Subch. D, Pt. 61* and the New Jersey Administrative Code *N.J.A.C. 16:54-1.2* are paramount. He was

scared to even complain. He wanted to complete his training and move on. Unfortunately, he was arbitrarily dismissed with one semester left for him to graduate.

Firstly, Hazem was subjected to a lack of proper supervision and training, which is essential for ensuring the safety of students and instructors alike. Shockingly, his instructors were allowed to fly with students under the influence of alcohol—posing a severe risk to everyone involved. Even more alarming is the fact that Hazem was unfairly blamed for raising concerns about such safety risks. It was not his job to ensure the instructors are not under the influence of drugs or alcohol, especially while flying and teaching the students. The school failed to comply with alcohol and drug regulations.

Furthermore, Hazem was unfairly targeted and treated with a double standard based on his religion and race. He was not only unfairly singled out for warnings and dismissal without prior evaluation but also charged exorbitant fees for airplane usage at the early stages of his education. This differential treatment is unacceptable and goes against the principles of equality and fairness that should guide your institution.

In addition, the intimidation tactics employed against Hazem, including the refusal to engage in discussions about rules and protocols, created a hostile environment that hindered his ability to learn and thrive. It is evident that there was a vendetta against him driven solely by his race and religion. As a result of these egregious actions, Hazem has suffered not only emotional stress, humiliation, and degradation but financially as well—having invested \$50,000 in tuition fees that have now been drained without any meaningful return.

For the foregoing reasons, we demand a full refund of the tuition paid by Hazem. Hazem did not receive the quality education and safe environment promised by your institution. He was treated differently from other students and was arbitrarily dismissed and targeted with unjustified reasons. We are not going to address the reasons for his dismissal, which were simply a pretext to terminate him without proper warning or due process.

In case this matter is not resolved with a full refund, we request a litigation hold on all documents and information pertaining to Hazem's case, including but not limited to, protocols related to student training, employee hiring and supervision, as well as any incidents similar to Hazem's experience. In addition, Hazem does not waive his right to file a complaint with the proper authorities on the compliance matters as well as his mistreatment. We expect a response from your institution by May 17, 2024. Please know that we are prepared to redress the violation of Hazem's rights to the fullest extent. We are hoping we can come to a swift resolution on this matter.

Thank you for your attention to this matter. We look forward to hearing from you.

Sincerely,



Omar Mohammedi, Esq.

Cc: Ahsen Janjua, Esq.